

MORTON & CRAIG LLC  
John R. Morton, Jr., Esq.  
110 Marter Ave.  
Suite 301  
Moorestown, NJ 08057  
Telephone: 856-866-0100  
Attorney for: Leaders Financial Company  
JM-5630\_\_\_\_\_

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In re:	)	
	)	Case No. 18-28067(CMG)
ANNETTE RIVERA	)	
	)	Chapter 13
	)	
	)	Hearing date: 6-19-19
	)	
	)	
	)	OBJECTION TO CONFIRMATION OF
	)	
	)	MODIFIED PLAN
	)	

---

Leaders Financial Company ("Leaders"), a secured creditor of the debtor, objects to the debtor's modified plan for the following reasons:

**a. MODIFIED PLAN FAILS TO PAY LEADERS IN ACCORDANCE WITH**

**PRIOR ORDER:** On 12-6-18 the court entered an order setting the amount to be paid to Leaders at \$9193.00 with adequate protection payments at \$140 a month. The modified plan fails to do this and must be amended to provide for payment to Leaders in accordance with that order.

/S/John R. Morton, Jr.

\_\_\_\_\_  
John R. Morton, Jr., attorney  
for Leaders Financial Company

Date: 9-30-18